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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

June 4, 1993

Office of the Secretary  
Attn: Ms. Donna R. Searcy  
Federal Communications Commission  
Washington, D.C. 20054

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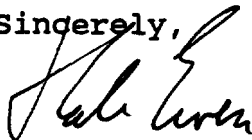
FCC - MAIL ROOM

RE: MM Docket No. 93-106

Dear Ms. Searcy:

Pursuant to Amendment of Part 74 of the Commission's Rules Governing Use of the Frequencies in the Instructional Television Fixed Service, enclosed are 10 copies of Parkland College's comments in support of the Proposed Rule Making.

Sincerely,

  
Dale Ewen  
Vice President  
Academic Services

DE:sr

attachments

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BEFORE THE  
Federal Communications Commission  
WASHINGTON, D.C. 20554

MM Docket No. 93-106

In the Matter of:

Amendment of Part 74 of the )  
Commission's Rules Governing Use )  
of the Frequencies in the )  
Instructional Television )  
Fixed Service )

To: The Commission )

COMMENTS IN SUPPORT OF  
THE PROPOSED RULE MAKING

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Parkland College (hereinafter known as "Parkland")  
respectfully submits its comments in response to MM Docket

elsewhere. However, this programming currently reaches only the immediate Champaign-Urbana area, and is accessible to only a small part of the district's population. Plans are underway to add new television production facilities at the Parkland campus, in anticipation of increasing instructional television and distance learning activities in the next several years.

3. As part of this commitment, Parkland has pending before the Commission a license application for four channels in the Instructional Television Fixed Service (ITFS), planned to serve several fixed receive sites within a 20-mile radius surrounding its campus at Champaign. This system will allow Parkland to serve much more of its potential student population with telecourses and other instructional programming, while minimizing transportation time and costs for both teachers and students. It will also create new opportunities for instructional programming in cooperation with the high schools in the district.

4. On December 16, 1992, Parkland entered into an agreement with Specchio Developers Investment Corporation (hereinafter known as "Specchio"), a "wireless cable" operator, to lease excess ITFS channel capacity to Specchio in exchange for construction and operation of Parkland's ITFS transmitting facilities. This agreement provides for Parkland to retain access to the equivalent of one full-time television channel. Under current Commission rules,

"channel mapping" technology must be used to insure that each of the four physical channels is utilized for instructional programming for the required minimum of 20 hours per week.

#### Summary

5. Parkland feels that the current ITFS rules which require a minimum of 20 hours per week of programming on each physical channel place unnecessary and illogical restrictions on both ITFS licensees and their wireless cable partners, and inhibit them from programming these channels efficiently and effectively. Further, these rules create an economic burden for wireless cable operators which can only serve to inhibit the growth of ITFS services generally. We favor the proposed rule changes in Docket 93-106 which would allow Parkland and other ITFS licensees to use a single channel for all ITFS programming as long as a total of at least 20 hours per week of programming is transmitted for each channel licensed.

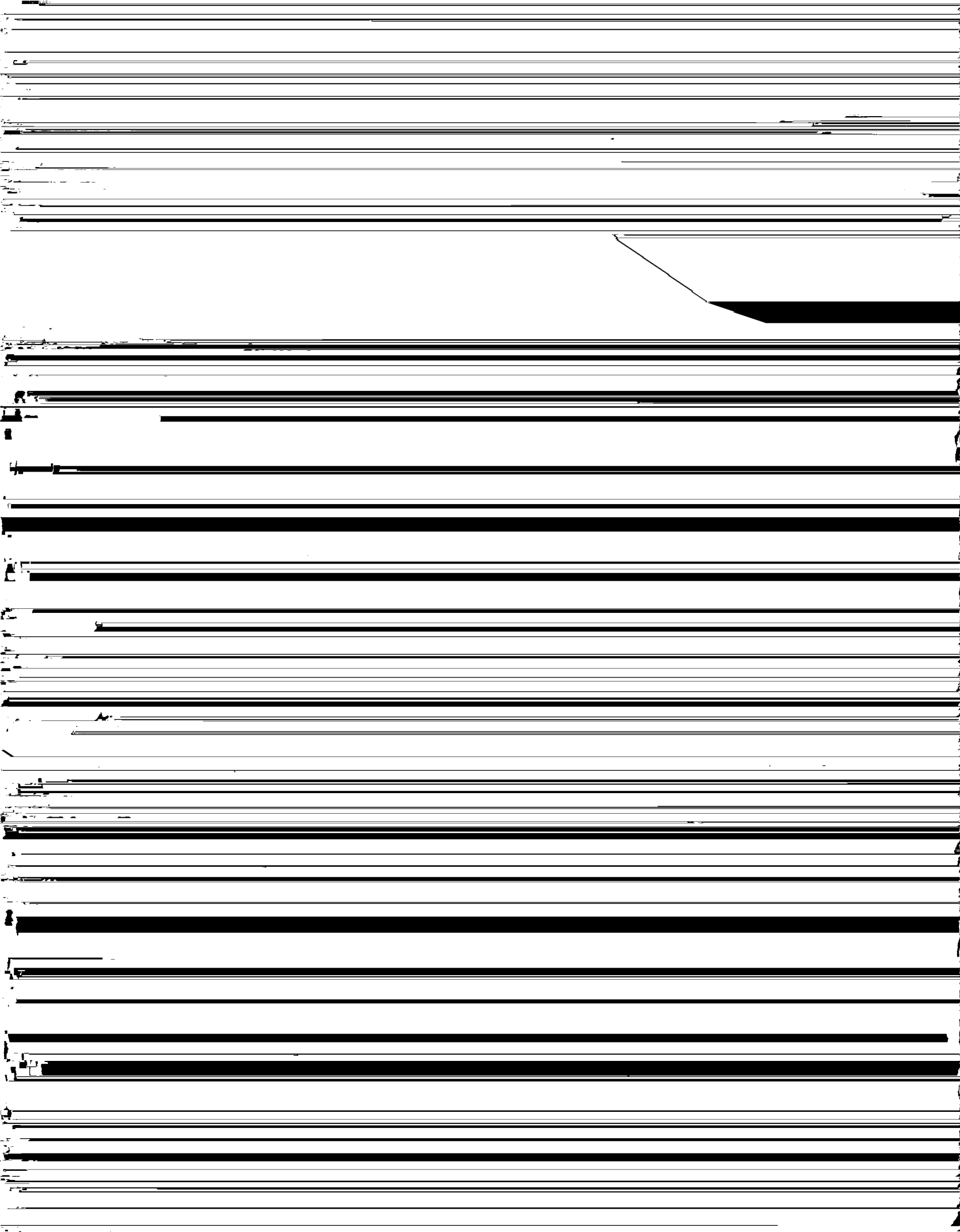
#### General Comments

6. One compelling argument against channel mapping is that it is simply a convoluted and expensive plan for achieving the false illusion that ITFS programming occupies fewer physical channels than are actually licensed. Aside from being more expensive to build and maintain, a system using channel mapping is prone to equipment breakdowns, operator errors, and mistakes due to miscommunication

between the separate parties who may schedule and operate the system. By eliminating the complex fiction of channel mapping, the proposed rule change will make ITFS operations both cheaper and more reliable for all licensees with wireless cable partners.

7. While many ITFS licensees must use multiple channels simultaneously to meet their instructional objectives, in Parkland's case we also wish to provide educational programming for several of the wired cable television systems in our area. It is much easier for a small cable company to justify allocating precious bandwidth for a single "Parkland channel," with a variety of educational programming back-to-back throughout the day, than for a channel with less identity and a more haphazard schedule. Parkland's limited equipment and staff resources will produce the greatest educational impact if they are used to program a single channel that meets the needs of both ITFS fixed site and cable television viewers throughout the district. "Channel loading" meets our near-term need to establish our educational programming identity throughout the district better than any channel mapping scheme.

8. We anticipate that additional channel capacity may be required for classroom delivery of a heavier schedule of educational programming in the future. We also share the Commission's concern that there should be no de facto permanent reallocation of ITFS channels to wireless cable



programming, develop innovative distance learning applications, achieve economies of scale in equipment purchases, and gain experience in system operation all increase with the number of ITFS systems in operation. To the extent that relaxing the rules requiring channel mapping will make it easier for other educational institutions to find wireless cable partners willing to invest in the construction and operation of an ITFS infrastructure nationwide, Parkland as well as all other ITFS users and instructional television producers will benefit. We do not believe that this growth of ITFS services will occur without the cooperation of the wireless cable industry, and therefore encourage the Commission to eliminate artificial barriers to establishing ITFS systems wherever possible.

11. While we are aware that digital video compression technology may, in the long term, solve many of the problems relating to ITFS spectrum use, we do not anticipate that

~~compression will allow a nationwide ITFS~~

to force either ITFS or wireless cable operators to actually use this technology until it is further developed. We agree that it will be appropriate to reevaluate the ITFS rules in another two to three years as video compression technology advances.

#### Conclusion

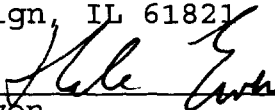
12. Parkland College is planning an ITFS system to serve its community college district with a variety of educational television programming. In the near term, a channel loading scheme in which one ITFS channel is used to carry the bulk of Parkland's programming will benefit the College and its district more than a burdensome and artificial channel mapping scheme as required by current Commission rules. We favor a relaxation of these rules so that we may implement a simpler, less expensive and more reliable ITFS system along with our wireless cable partner. These rule changes will also encourage flexibility in scheduling instructional programming on multiple channels in the future, and will stimulate the development of more partnerships between educational institutions and wireless cable enterprises elsewhere, which will benefit the instructional television field as a whole. We urge Commission approval of the proposed changes to Part 74 to give ITFS licensees and their partners more flexibility in their use of allocated channels, while retaining the essential educational character of ITFS services. We



believe that any rulemaking based on the imminent arrival of video compression technology is premature.

Respectfully submitted,

Parkland College  
2400 W. Bradley Ave.  
Champaign, IL 61821

By:  06/04/93  
Dale Ewen  
Vice President for Academic Services